

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re:

Chapter 7

Tiffany Bestani

No. 16-12768-BFK

Debtor

OPPOSITION TO MOTION TO REOPEN CASE

COMES NOW the debtor, by counsel, and responds as follows to the Former Trustee's motion to reopen this case:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The defendants in the State of California lawsuit are in essence attempting to perpetrate a fraud on this Court. The defendants in the State of California litigation ("the Defendants") are seeking to purchase "Undisclosed Assets" which the debtor did not and does not own. The domain names in question are not owned by the debtor. The attached exhibits (collectively A through G) help to explain why the Defendants contacted the former trustee and why they sought to enter into a deal with the former trustee for the purchase of these "Undisclosed Assets" for the price of \$16,500.00. In fact, the argument that the Debtor owns these "Undisclosed Assets" - the domain names- was rejected by the State Court Judge in California when the Defendants sought unsuccessfully to obtain an ex parte TRO against the Debtor.

7. Denied. The Former Trustee should not be permitted to sell that which Debtor does not own.
8. Denied. As stated, there are no “Undisclosed Assets.” In addition, as to the underlying litigation (the lawsuit filed by Debtor against the Defendants in the State of California), that asset was disclosed, by all accounts discussed at the 341, and subsequently abandoned by the Former Trustee.
9. Denied.
10. Admitted.

Respectfully submitted,

/s/Robert S. Brandt

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CERTIFICATE OF SERVICE

The foregoing Opposition to Motion to Reopen was served on the Former Trustee by ECF on this 23rd day of October, 2017.

/s/Robert S. Brandt